Interoffice Communication

DATE: December 3, 2007

TO: Deans, Directors and Department Chairs

FROM: Elizabeth Hoffman
Executive Vice President and Provost

Warren R. Madden
Vice President for Business and Finance

SUBJECT: Department of Homeland Security New Regulation Information

Background

On November 20, 2007, the Department of Homeland Security (DHS) published a Chemical of Interest (COI) list as part of the new Chemical Facility Antiterrorism Standards (CFATS). Although this rule was written for industry, universities meet the definition of a chemical facility if they keep Chemical of Interests (COIs) in excess of specific thresholds. Efforts to have the regulation modified to meet the needs of the higher education community were not successful. Iowa State now has 60 days to determine if and how much of these COIs are on campus and submit a risk assessment, called a Top Screen, to DHS. ISU has requested an additional 60 days to comply, which the regulations permit. However, we must initially plan to submit a Top Screen to DHS by January 19, 2008, unless an extension is granted. There are significant penalties for noncompliance.

Required Actions

The Department of Environmental Health & Safety (EH&S) is being asked to coordinate the collection of chemical information and submittal of the Top Screen. At this time we need the cooperation of all campus departments in providing EH&S with their chemical information. EH&S is preparing a web site where departments can ensure compliance using one of three options:

- Departments that do not use chemicals will simply need to certify that they do not possess any COIs.
• Departments that have already submitted chemical inventories to EH&S, will only need to verify that this task is complete and accurate. EH&S will use existing data to determine their COI inventory. It will be important for departments to verify the status of their chemical inventories before they choose this option. To date, EH&S has received chemical inventories from about half of the campus locations known to store chemicals.

• Departments that possess chemicals and have not submitted complete chemical inventories are being requested to review the DHS list and certify that they do not have COIs, or submit an inventory by January 4, 2008. If the university is granted a 60-day extension, this date will be extended to February 22, 2008. EH&S must compile all of the reports to prepare the university’s response to DHS.

While many chemicals on the list are uncommon, it is noteworthy that some, such as nitric acid, are found in many academic laboratories, workshops and other settings. EH&S is updating their web page for data submittal. When that has been accomplished, departments will receive an email requesting electronic submittal of their information. In the meantime, you are requested to determine which of the three reporting options best fits your department and initiate the collection of chemical information if necessary.

We know this is an administrative burden coming at the end of the semester, but the Department of Homeland Security’s regulations are explicit and Iowa State University needs to comply. We want to express our sincere thank you for your cooperation and assistance with this request.

Additional Information

The Federal regulations can be reviewed in the November 20, 2007 Federal Register.

Please go to http://www.ehs.iastate.edu/cms/default.asp?action=article&ID=380 for additional information or to review the COI list. If you have any questions, you may contact Bill Diesslin, Assistant Director of EH&S, at (515) 294-2105.